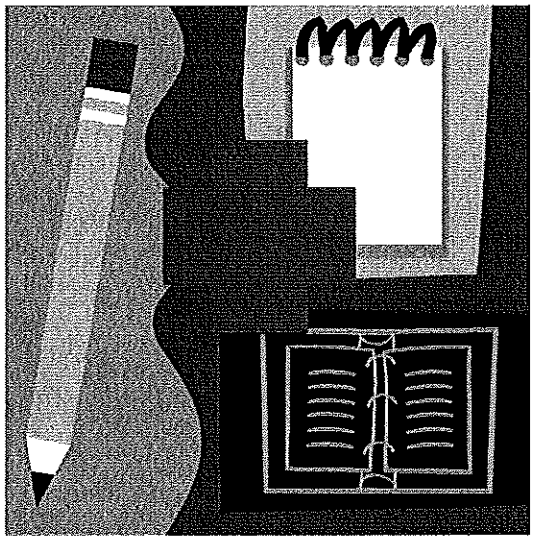
Education and Workforce Development Cabinet



Occupational Health and Safety Program

Index

Kentucky Education and Workforce Development Cabinet Occupational Health and Safety Program Administration

Health and Safety Program Guidelines

Scope and Application

These guidelines apply to all places of employment in the Education and Workforce Development Cabinet which are covered by Kentucky Occupational Safety and Health Standards in 29 CFR Part 1910 (General Industry) Kentucky Occupational Safety and Health Program.

Introduction

The Kentucky Occupational Safety and Health Program (Kentucky OSH) has concluded that effective management of worker safety and health is a decisive factor in reducing the extent and severity of work related injuries and illnesses. Effective occupational health and safety management addresses all work related hazards, including those potential hazards which could result from a change in worksite conditions or practices. It addresses hazards whether or not they are regulated by government standards. Kentucky OSH reached this conclusion as part of the Enforcement and Consultation Programs, which have revealed a basic relationship between effective safety program management and a lower incidence and severity of employee injuries.

It is also recognized that effective management of safety and health protection improves employee morale and productivity, as well as, significantly reducing workers' compensation costs and other less obvious costs of work related injuries and illnesses.

Cumulative evidence indicates that systematic management policies, procedures, and practices are fundamental to the reduction of work related injuries and illnesses, and their attendant economic costs. Kentucky OSH and Federal OSHA have developed basic Occupational Health and Safety Guidelines for effective management of occupational health and safety.

General

Employers are advised and encouraged to institute and maintain programs based on systematic policies, procedures, and practices that are adequate to recognize and protect their employees from occupational safety and health hazards. In essence, the end (protection of employees from occupational safety and health hazards) determines the means. The criterion for determining what is needed in a safety and health program at a particular office or facility is: whatever feasible action it takes to protect the workers from the safety and health hazards at that specific location. The form of the safety and health program elements and implementing actions will vary at each office or facility according to the identified and potential hazards at the office or facility.

An effective Occupational Health and Safety Program includes provisions for the systematic identification, evaluation, and prevention or control of general workplace hazards, specific job hazards, and potential hazards which arise from foreseeable conditions.

Provisions for identifying and preventing hazards are systematic. If not, hazards or potential hazards will be missed and/or preventive controls will break down, and the chance of injury or illness will significantly increase. **General workplace hazards** include such conditions as tripping hazards in walking areas and poor illumination. **Specific job hazards** may relate to the specific conditions in a job, such as exposure to a saw blade, or to the inherent hazardousness of an operation required in the job, such as the removal of jammed material from a point of operation. **Potential hazards** include such situations as the possibility of exposure to toxic chemicals as a result of a rupture of piping from the impact of a forklift.

Although compliance with the law, including specific Ky OSH and Federal OSHA standards, is an important objective, an effective program looks beyond specific requirements of law to address all hazards. It will seek to prevent injuries and illnesses, whether or not compliance is at issue. OSHA and other government standards provide important guidance on the identification and control of hazards, but they are not always enough. Although compliance with the law is an important objective of and motive for an effective program, the most successful Occupational Safety Programs look beyond government standards and legal requirements. These Safety Managers look for other sources of information about hazards, such as the National Electrical Code (NEC), the American Conference of Governmental Industrial Hygienists (ACGIH), and the American National Standards Institute (ANSI); and use analytical abilities to look for and address hazards not covered by government or other standards. The motive is to prevent injuries and illnesses and the attendant human and economic costs, whether or not compliance with the law is at issue.

This approach to occupational health and safety management is essential in view of the difficulty that regulatory agencies have in moving quickly to set standards for every possible hazard in the workplace and to revise them when new information becomes available.

The extent to which the program is described in writing is less important than how effective it is in practice. As the size of a worksite or the complexity of a hazard increases, the need for written guidance increases to ensure clear communication of policies and priorities are consistent and fair application of rules. Relatively simple, unwritten policies, practices, and procedures are adequate to address the hazards in many smaller or less hazardous establishments; however, the more complex and hazardous an operation is, the more formal (written) and complex the program will probably need to be. A written Safety Program which is revised regularly can clarify policy, create consistency and continuity in its interpretation, serve as a checkpoint whenever there is a question of priority between safety and production, and support fair and equitable enforcement of safe work rules and practices.

Major Occupational Health and Safety Program Elements

An effective Occupational Health and Safety Program will include the following elements.

One: Management commitment and employee involvement.

Management commitment provides the motivating force and the resources for organizing and controlling activities within an organization. In an effective Safety Program, management regards worker safety and health as a fundamental value of the organization and applies its commitment to safety and health protection with as much vigor as to other organizational purposes. Employee involvement provides the means through which workers develop and/or express their own commitment to safety and health protection, for themselves and for their fellow workers.

*Provide employees with sanitary and safe working conditions.
*Assign occupational health and safety responsibilities to employees and management.
*Assign occupational health and safety designees authority to correct hazards.
*Ensure employees may voice occupational health and safety concerns without fear of reprisal.
*Inform employees of occupational health and safety vulnerabilities and hazards.
*Coordinate hazard communication with other employers on site.

Two: OSHA Standards that apply to most general industry employers.

Hazard Communication Standard
Emergency Action Plan Standard
Fire Safety Standard
Egress and Exit Routes Standard
Walking/Working Surfaces Standard
Medical and First Aid Standard
Machine Guarding Standard
Lockout/Tagout Standard
Bloodborne Pathogens Standard
Electrical Standard
Personal Protective Equipment Standard
Respirators Standard
Noise Standard
Confined Spaces Standard
Powered Industrial Trucks Standard

Three: Safety Audits, identification, and determination involve a variety of worksite examinations, to identify not only existing hazards but, also conditions and operations in which changes might occur to create hazards.

Unawareness of a hazard which stems from failure to examine the worksite is a sure sign that safety and health policies and/or practices are ineffective. Effective

management activity analyzes the work and worksite to anticipate and prevent harmful occurrences.

The purpose of safety inspections is to ensure the safety of management, staff, customers, and students regardless of location and program. Inspections and reports shall be based on OSHA Standards, Kentucky Fire Code, National Electrical Code, consensus standards, and Cabinet Policy.

*Evaluate operations, procedures, facilities, and equipment to identify occupational health and safety hazards.
*Monitor exposure levels, vulnerabilities, hazards; and those activities established to correct with documentation.
*Ensure regular occupational health and safety inspections of safety equipment, systems, and supplies with documentation.
*Conduct accident and near-miss investigations.
*Determine if engineering and/or administrative controls or personnel protective equipment are to be used and monitor use with documentation.

The Safety Inspection Report consists of observations supported by a safety standard, regulation, consensus standard, Cabinet Policy, or combination. The findings in the Safety Inspection Report are not violations, which are part of an enforcement process, but a staff document prepared to prevent enforcement which could lead to a violation and fine.

Four: Develop a Comprehensive Occupational Safety and Health Program.

Hazard prevention and control are triggered by a determination that a hazard or potential hazard exists. Where feasible, hazards are prevented by effective design of the job site or job. Where it is not feasible to eliminate them, they are controlled to prevent unsafe and unhealthful exposure. Elimination or control is accomplished in a timely manner, once a hazard or potential hazard is recognized.

*Ensure machines, tools, and office equipment are in safe working order and in compliance with relevant federal and state OSHA standards.
*Institute engineering and/or administrative controls or personnel protective equipment are in place, being used, and documented.
*Perform housekeeping to remove hazards posed by scrap and debris in work areas.
*Guarantee safe means of egress and/or in-place shelter for employees and visitors.
*Develop Emergency Action Plans and post EAP Floorplans throughout the facility.
*Develop fire prevention and protection programs, including fire extinguisher inspection and maintenance.
*Provide medical services, first aid treatment and supplies.

Five: Safety and health training addresses the safety and health responsibilities of all personnel (salaried and/or hourly).

It is often most effective when incorporated into other training about performance requirements and job practices. Its complexity depends on the size and complexity of the worksite, and the nature of the hazards and potential hazards at the site.

*Train employees to recognize hazards.
*Train employees to recognize and avoid unsafe conditions.
*Train employees on safe operation of equipment, machinery, and office equipment.
*Train employees on hazards of access ladders, stairways, and all types of storage areas.
* Train employees on confined and enclosed space entry hazards and precautions.
* Train employees to use safety equipment (personal and on machinery).

Six: Recordkeeping and Abatement Verification.

Reporting

OSHA requires all employers, regardless of size or industry, to report the work related death of any employee or hospitalizations of three or more employees.

Recordkeeping

OSHA requires certain employers to keep records of workplace injuries and illnesses.

Maintain medical and exposure records

OSHA Standards requires employers to provide employees, their designated representative, and OSHA with access to employee exposure and medical records. Employers generally must maintain employee exposure records for 30 years and medical records for the duration or the employee's employment plus 30 years.

OSHA Poster

All employers must post the OSHA poster (or state plan equivalent) in a prominent location in the workplace.

Maintain appropriate documents and tags for abatement verification and inspection/audits

This documents what actions are taken to correct specific issues and problems as well as the required monthly and/or periodic inspections of safety equipment and machinery.

These Safety Program elements consist of methods historically used to accomplish organizational objectives. They are generic in that they are generally applicable regardless of unique operations or conditions of particular firms. Only the form which

they take varies. Though at points they are expressed in the terms of the "hierarchical" organizations most common in American industry (i.e., by reference to "managers," "supervisors," "employees"), they can easily be adapted to other organizational forms or styles of operation. They relate to essential concerns and activities of any organization.

Seven: Find additional compliance information.

The KyOSH and federal OSHA websites includes a collection of forms, publications, resources, and sample programs, plus additional compliance assistance resources.

Recommended Actions

Management Commitment and Employee Involvement

Each action listed in this section represents the application to occupational safety and health of a key means for organizing, motivating, and controlling activities within an organization.

State clearly a worksite policy on safe and healthful work and working conditions, so that all personnel with responsibility at the site and personnel at other locations with responsibility for the site understand the priority of safety and health protection in relation to other organizational values. A statement of policy is the foundation of occupational safety and health management. It communicates the value in which safety and health protection is held in the business organization. If it is absorbed by all in the organization, it becomes the basic point of reference for all decisions affecting occupational safety and health. It also becomes the criterion by which the adequacy of protective actions is measured.

Establish and communicate a clear goal for the Occupational Health and Safety Program and objectives for meeting that goal, so that all members of the organization understand the results desired and the measures planned for achieving them. A goal and implementing objectives, make the safety and health policy more specific. Communicating them ensures that all in the organization understand the direction the program is taking.

Provide visible top management involvement in implementing the Safety Program, so that all will understand that management's commitment is serious. Actions speak louder than words. If top management gives high priority to safety and health protection in practice, others will see and follow. If not, a written or spoken policy of high priority for safety and health will have little credibility, and others will not follow it. Plant managers, who wear required personal protective equipment in work areas, perform periodic "housekeeping" inspections, and personally track performance in safety and health protection demonstrate such involvement.

Provide for and encourage employee involvement in the structure and operation of the Occupational Health and Safety Program and in decisions that affect their safety and health, so that they will commit their insight and energy to achieving

the safety and health program's goal and objectives. Since an effective Safety Program depends on commitment by employees as well as managers, it is important for their concerns to be reflected in it. An effective program includes all personnel in the organization (managers, supervisors, and others-in policy development) planning, and operations.

This does not mean transfer of responsibility to employees. The Occupational Safety and Health Act of 1970 clearly places responsibility for safety and health protection on the employer. However, employees' intimate knowledge of the jobs they perform and the special concerns they bring to the job give them a unique perspective which can be used to make the program more effective. Employee participation may take any or all of a number of forms. For instance, the system of notifying management personnel about conditions that appear hazardous serves as a major means of worksite analysis to identify hazards.

Such a system is, however, by itself not sufficient to provide for effective employee involvement. Various forms of participation engage employees more fully in safety management.

*Inspecting for hazards and recommending corrections or controls;

*Analyzing jobs to locate potential hazards and develop safe work procedures;

*Developing or revising general rules for safe work;

*Training newly hired employees in safe work procedures and rules, and/or training their co-workers in newly revised safe work procedures;

*Providing programs and presentations for safety meetings; and assisting in accident investigations.

Such functions can be carried out in a number of organizational contexts, such as safety committees, safety circle teams, rotational assignment of employees to such functions, and acceptance of employee volunteers for functions.

Employee involvement is effective only when the employer welcomes it and provides protection from any discrimination, including unofficial harassment to the employees involved. However, inclusion of employees in one or more of the suggested activities, or in any way that fit the individual worksite and provides an employee role that has impact on decisions about safety and health protection, will strengthen the employer's overall program of safety and health protection.

Assign and communicate responsibility for all aspects of the Safety Program, so that managers, supervisors and employees in all parts of the organization know what performance is expected of them.

Assignment of responsibility for Occupational Health and Safety management to a single staff member, or even a small group, will leave other members feeling that someone else is taking care of safety and health problems. Everyone in an organization has some responsibility for occupational safety and health. A clear statement of that responsibility, as it relates both to organizational goals and objectives and to the specific functions of individuals, is essential. If all persons in an organization do not know what is expected of them, they are unlikely to perform as desired.

Provide adequate authority and resources to responsible staff, so that assigned responsibilities can be met. It is unreasonable to assign responsibility without providing adequate authority, training and resources to get the job done. For example, a person with responsibility for the safety of a piece of machinery needs the authority to shut it down and get it repaired. Needed resources may include adequately trained and equipped personnel and adequate operational and capital expenditure funds.

Hold managers, supervisors, and employees accountable for meeting their responsibilities, so that essential tasks will be performed. Stating expectations of managers, supervisors, and other employees means little if management is not serious enough to track performance, to reward it when it is competent and to correct it when it is not. Holding everyone accountable for meeting their responsibilities is at the heart of effective worker safety and health protection. If management states high expectations for such protection, but pays greater attention to productivity, or other values, the Safety Program will be neglected.

To be effective, a system of accountability must be applied to everyone, from senior management to hourly employees. If some are held firmly to expected performance and others are not, the Safety Program will lose its credibility. Those held to expectations will be resentful; those allowed to neglect expectations may increase their neglect. Consequently, the chance of injury and illness will increase.

Review program operations at least annually to evaluate their success in meeting the goal and objectives, so that deficiencies can be identified and the program and/or the objectives can be revised.

A *comprehensive Safety Program Audit* is essential to evaluate the whole set of safety and health management means, methods, and processes, to ensure that they are adequate to protect against the potential hazards at the specific worksite. The audit determines whether policies and procedures are implemented as planned and whether in practice they have met the objectives set for the program. It also determines whether the objectives provide sufficient challenge to lead the organization to meet the program goal of efficient safety and health protection. When either performance or the objectives themselves are found inadequate, revisions are made. Without such a comprehensive review, program flaws and their interrelationship may not be caught and corrected.

Worksite Analysis

Kentucky OHSA feels that identification of hazards and potential hazards at a worksite requires an active on-going examination and analysis of work processes and working conditions. Because many hazards are by nature difficult to recognize, effective examination and analysis will approach the work and working conditions from several perspectives. Each of the activities recommended in this section represents a different analysis perspective.

The recognition of hazards which could result from changes in work practices or conditions requires especially thorough observation and thought, both from those who perform the work and those who are specially trained for that purpose.

Since such divergence from the routine and familiar is often the occasion for hazards to develop and accidents to occur, the anticipation of such changes is critical. Identification at a worksite of those safety and health hazards which are recognized in its industry is a critical foundation for safety and health protection. It is general duty of the employer under the Occupational Safety and Health Act of 1970.

Successful employers will actively seek the benefit of the experience of others in their industry, through trade associations, equipment manufactures, and other sources.

An effective Occupational Health and Safety Program does not stop at this point, however. It continually reviews working conditions and operations to identify hazards which have not previously been recognized in the industry. Implicit in the provision for the audits, reviews, and analysis recommended in this section is the need for employers to seek competent advice and assistance when they lack needed expertise and to use appropriate means and methods to examine and assess all existing and foreseeable hazards. Personnel who perform comprehensive baseline and update surveys, analyses of new facilities, processes, procedures, and equipment, and job hazard analyses may require greater expertise than those who conduct routine inspections, since the former are conducting a broader and/or deeper review.

Personnel performing regular inspections should, however, possess a degree of experience and competence adequate to recognize hazards in the areas they review and to identify reasonable means for their correction or control. Such competence should normally be expected of ordinary employees who are capable of safely supervising or performing the operations of the specific workplace.

So that all hazards are identified, conduct comprehensive baseline Safety Audits with periodic updated surveys. In addition to Safety Audits, management should analyze planned and new facilities, processes, materials, and equipment in the form of a Job Hazard Analysis.

A comprehensive baseline Safety Audit permits a systematic recording of those hazards and potential hazards which can be recognized without intensive analysis. This baseline record provides a checklist for the more frequent routine inspections. With those

hazards under control, attention can be given to the intensive analysis required to recognize less obvious hazards. Subsequent Safety Audits and Job Hazard Analysis will provide opportunities to step back from the routine check on control of previously recognized hazards and look for others. With the baseline established, these subsequent audits and analysis are additional occasions for focusing on less obvious hazards.

The frequency with which Safety Audits are required depends on the complexity, hazardousness, and changeability of the worksite. Many successful worksites conduct such reviews on an annual or biannual basis.

Analysis of new facilities, processes, materials, and equipment in the course of their design and early use (sometimes called "change analysis") provides a check against the introduction of new hazards. Effective management ensures that conduct of such analyses during the planning phase, just before their first use, and during the early phases of their use. Numerous specific OSHA standards require inspection of particular equipment, conditions, and activities as a safety precaution prior to operation or use. However, in an effective Occupational Health and Safety Programs, this is applied more broadly to all conditions and activities.

Job hazard analysis is an important tool for more intensive analysis to identify hazards and potential hazards not previously recognized, and to determine protective measures. Through more careful attention to the work process in a particular job, analysts can recognize new points at which exposure to new hazards may occur or at which foreseeable changes in practice or conditions could result in new hazards.

Provide for regular site safety inspections, so that new or previously missed hazards and failures in hazard controls are identified. Once a Safety Audit of the workplace has been conducted and hazard controls have been established, routine site safety and health inspections are necessary to ensure that changes in conditions and activities do not create new hazards and that hazard controls remain in place and are effective. Routine industrial hygiene monitoring and sampling are essential components of such inspections in many workplaces. Personnel conducting these inspections also look out for new or previously unrecognized hazards, but not as thoroughly as when conducting a Safety Audit. The frequency and scope of those "routine" inspections depends on the nature and severity of the hazards which could be present and the relative stability and complexity of worksite operations.

An Occupational Health and Safety Program must provide a reliable system for employees, without fear of reprisal, to notify management personnel about conditions that appear hazardous and to receive timely and appropriate responses. A reliable system for employees to notify management of conditions or practices that appear hazardous and to receive a timely and appropriate response serves a dual purpose. It gives management the benefit of many more points of observation and more experienced insight in recognizing hazards or other symptoms of breakdown in safety and health protection systems. It also gives employees assurance that their investment in safety and health is worthwhile.

This notification system is reliable only if it ensures employees a credible and timely response. The response must include both timely action to address any problems identified and a timely explanation of why particular actions were or were not taken. Since the employer benefits from employee notices, effective management will not only guard against reprisals to avoid discouraging them, but will take positive steps to encourage their submission.

An Occupational Health and Safety Program must also provide for investigation of accidents and "near miss" incidents, so that their causes and means for their prevention are identified. Accidents and incidents, in which employees narrowly escape injury, clearly expose hazards. Analysis to identify their causes permits development of measures to prevent future injury or illness. Although a first look may suggest that "employee error" is a major factor, it is rarely sufficient to stop there. Even when an employee has disobeyed a required work practice, it is critical to ask, "Why?" A thorough analysis will generally reveal a number of deeper factors, which permitted or even encouraged an employee's action. Such factors may include a supervisor's allowing or pressuring the employee to take short cuts in the interest of production, inadequate equipment, or a work practice which is difficult for the employee to carry out safely. An efficient investigation and appropriate conclusions will identify actions to address each of the casual factors in an accident or "near miss" incident.

Accident reports and investigations analyze injuries, illnesses, and trends over time, so that patterns with common causes can be identified and prevented. A review of injury experience over a period of time may reveal patterns of injury with common causes which can be addressed. Correlation of changes in injury experience with changes in safety and health program operations, personnel, and production processes may help to identify causes.

Hazard Prevention and Control

Establish procedures so that all current and potential hazards, however detected, are corrected or controlled in a timely manner using the follow measures:

Engineering techniques where feasible and appropriate;

Procedures for safe work which are understood and followed by all affected parties, as a result of training, positive reinforcement, correction of unsafe performance, and, if necessary, enforcement through a clearly communicated disciplinary system;

Provision of personal protective equipment; and

Administrative controls, such as reducing the duration of exposure.

Hazards, once recognized, are promptly prevented or controlled. Management action in this respect determines the credibility of its safety and health management policy and the usefulness of its entire program. An effective program relies on the means for prevention or control which provides the best feasible protection of employee safety and

health. It regards legal requirements as a minimum. When there are alternative ways to address a hazard, effective managers have found that involving employees in discussions of methods can identify useful prevention and control measures, serve as a means for communicating the rationale for decisions made, and encourage employee acceptance of the decisions.

When safe work procedures are the means of protection, ensuring that they are followed becomes critical. Ensuring safe work practices involves discipline in both a positive sense and a corrective sense. Every component of effective safety and health management is designed to create a disciplined environment in which all personnel act on the basis that worker safety and health protection is a fundamental value of the organization. Such an environment depends on the credibility of management's commitment to safety and health protection, through evidences of direct management involvement in safety and health matters, inclusion of employees in decisions which affect their safety and health, rigorous worksite analysis to identify hazards and potential hazards, stringent prevention and control measures, and thorough training.

In such an environment, all personnel will understand the hazards to which they are exposed, why the hazards pose a threat, and how to protect themselves and others from the hazards. Training for reinforced by encouragement of attempts to work safely and by positive recognition of safe behavior.

If, in such a context, an employee, supervisor, or manager fails to follow a safe procedure, it is advisable not only to stop the unsafe action but also to determine whether some condition of the work has made it difficult to follow the procedure or whether some management system has failed to communicate the danger of the action and the means for avoiding it. If the unsafe action was not based on an external condition or a lack of understanding, or if, after such external condition or lack of understanding has been corrected, the person repeats the action, it is essential that corrective discipline be applied. To allow an unsafe action to continue not only continues to endanger the employee and perhaps others; it also undermines the positive discipline of the entire safety and health program. To be effective, corrective discipline must be applied consistently to all, regardless of role or rank; but it must be applied. Factors which may affect the time required for correction of hazards include numerous factors.

First, the complexity of abatement technology; degree of risk; and the availability of necessary equipment, materials, and staff qualified to complete the correction. Because conditions affecting hazard correction and control vary widely, it is impractical for OSHA to recommend specific time limits for all situations. An effective program corrects hazards in the shortest time permitted by the technology required and the availability of needed personnel and materials. It also provides for interim protection when immediate correction is not possible.
Second, provision for facility and equipment maintenance, so that hazardous breakdown is prevented. Maintenance of equipment and facilities is an especially important means of anticipating potential hazards and preventing their development.

Planning, scheduling, and tracking preventive maintenance activities provide a systematic way of ensuring that they are not neglected.

Third, planning and preparing for emergencies, and conducting training and drills as needed, so the response of all parties to emergencies will be "second nature." Planning and training for an emergency is essential in minimizing the harmful consequences of an accident or other threat if it does occur. If personnel are not trained to react to emergencies, they may expose themselves and others to greater danger rather than reduce their exposure. The nature of potential emergencies depends on the nature of site operations and its geographical location. The extent to which training and drills are needed depends on the severity and complexity of the emergencies which may arise.

Fourth, establishment of a medical program which includes availability of first aid on site and of physician and emergency medical care nearby, so that harm will be minimized if an injury or illness does occur. The availability of first aid and emergency medical care are essential in minimizing the harmful consequences of injuries and illnesses if they do occur. The nature of services needed will depend on the seriousness of injuries or health exposures which may occur. Minimum requirements are addressed in OSHA standards.

Safety and Health Training

Education and training are essential means for communicating practical understanding of the requirements of effective safety and health protection to all personnel. Without such understanding managers, supervisors, and other employees will not perform their responsibilities for safety and health protection effectively.

It is not suggested that elaborate or formal training programs solely related to safety and health are always needed. Integrating consideration of safety and health protection into all organizational activities is the key to its effectiveness. Safety and health information and instruction is, therefore, often most effective when incorporated into other training about performance requirements and job practices, such as management training on performance evaluation, problem solving, or managing change; supervisor's training on the reinforcement of good work practices and the correction of poor ones; and employee training on the operation of a particular machine or the conduct of a specific task.

Employers must ensure understanding of safety and health information by employees, supervisors, and managers. The act of training itself is not sufficient to ensure practical comprehension. Some means of verifying comprehension is essential. Formal testing, oral questioning, observation, and other means can be useful. Observing and interviewing employees, supervisors, and managers are the most effective measures for determining their understanding of what is expected of them in practice. Although there is no fully reliable means for ensuring understanding, effective safety and health management will apply the same diligence with respect to employee, vendor, and visitor protection as is applied to ensuring an understanding of other operational requirements, such as time and attendance, production schedules, and job skills.

All employees must understand the hazards to which they may be exposed and how to prevent harm to themselves and others from exposure to these hazards. The commitment and cooperation of employees in preventing and controlling exposure to hazards is critical, not only for their own safety and health but for that of others as well. That commitment and cooperation depends on their understanding what hazards they may be expected to, why the hazards pose a threat, and how they can protect themselves and others from the hazards. The means of protection which they need to understand include not only the immediate protections from hazards in their work processes and locations, but also the management systems which commit the organization to safety and health protection.

OSHA's *Hazard Communication Standard* specifies, for chemical hazards, an employer duty to inform employees about workplace hazards and to provide training that will enable them to avoid work related injuries or illnesses. Other standards set forth training requirements, as summarized in OSHA Publication 2254, "Training Requirements in OSHA Standards and Training Guidelines." The rational for these standards requirements is; however, applicable in relation to all hazards. Education and training in safety and health protection is especially critical for employees who are assuming new duties. The extent of hazard information which is needed by employees will vary, but include at least the following elements.

General hazards and safety rules of the worksite.

Specific hazards, safety rules, and practices related to particular work assignments.

Employee's role in emergency situations. Such information and training is particularly relevant to hazards that may not be readily apparent to, or within the ordinary experience and knowledge of, the employee.

Analyzing the work under their supervision or control to identify unrecognized potential hazards.

Maintaining physical protections in their work areas.

Reinforcing employee training on the nature of potential hazards in their work and on needed protective measures, through continual performance feedback and, if necessary, through enforcement of safe work practices.

Ensuring that managers understand their occupational safety and health responsibilities, because first-line supervisors have an especially critical role in safety and health protection because of their immediate responsibility for workers and for the work being performed. Effective training of supervisors will address their safety and health management responsibilities as well as information on hazards, hazard prevention, and response to emergencies. Although they may have other safety and health responsibilities, those listed in these guidelines merit particular attention.

Why Accidents Happen

Management style associated with occupational illness and accidents can be classified style and beliefs, human resources policies, operational procedures, storage of supplies and merchandise, or a combination of two or more classifications.

The way a manager approaches responsibilities, and the beliefs about personnel and the nature of work affects the way in which the manager organizes and implements occupational health and safety. Managers work within two dimensions: 1) attention to tasks and assignments and 2) attention to relationships and interactions with subordinates. The issue of safety and the cost of accidents and injuries generally are not apparent to management unless the organization provides documentation of the financial and human costs to the organization. Some of the management styles and beliefs that contribute to the lack of an occupational health and safety programs, or the breakdown of such programs include the following.

Arrogance

Often, managers believe that accidents will not happen; therefore, there is no priority or commitment. Without a genuine commitment to occupational health and safety, management will try to remain ignorant of the cost of accidents and injuries. Management also knows that the reporting of employee injury claims will impact their Workers Compensation insurance and may result in a culture of intimidation in which employees will be "encouraged" not to report injuries and accidents, but also not to file for Workers Compensation insurance or other benefits. Arrogant management believes that "no news is good news."

"Clueless" Managers

Clueless managers display a lack of understanding about the human and financial costs of injuries, illnesses, and unsafe conditions. Often they think that if they ignore safety and related issues long enough, both will disappear. Refusing to address occupational health and safety have historically had devastating results.

Lack of Accountability

Managers, who are not accountable for occupational health and safety, generally ignore the incidence of accidents and their causes. This attitude will not change unless the organization experiences significant and unpleasant consequences. A safety conscious organization must start at the top. The Board of Directors, or top management, must adopt and enforce consequences for unsafe conditions.

Occupational Health and Safety Model

The Occupational Health and Safety Program Model is thorough, but not exhaustive. As will all models, this one is designed to identify critical elements and relationships of a safety program. Some elements and relationships may not be applicable to a specific

organization, and there may be others which can be added. The user of the Occupational Health and Safety Program Model should not assume that if all elements and relationships are implemented, that a complete occupational health and safety program is established and operational. Only an organization's management can determine whether or not an occupational health and safety program is adequate to protect its employees, visitors, vendors, and assets.

Basic Program Model Elements

*Purpose, justification, and support of and for the program.
*Policy Statement, Mission Statement, and Safety Philosophy.
*Principles, goals, objectives, procedures, evaluation, and measures.
*Organization of the Occupational Health and Safety Program (hierarchy, reporting structure, place within the organization, Organizational Chart (see Appendices for sample Organization chart).
*Assignment of responsibility and authority and accountability (who has specific duties; define responsibilities; roles of management, Safety Director/Manager, Supervisors, and employees.
*Management support (commitment, direction, and role.).
*Resources (personnel, material, financial).
*Establishment and general information about Safety Committee.
*General information about Safety Committee meetings...

Hazard and Incident Analysis

- Hazard identification and analysis.
- Procedures to correct hazards.
- Accident investigation.
- Accident analysis.
- Near miss investigation and analysis.

Safety Programs Specific to the Location and Identified Hazards

Accident Reporting and Recordkeeping

Employee
Students
Customers
Inmates
OSHA Requirement
  300 Log
  300A Report
Education and Workforce Development Cabinet Accident Report

Back Safety

OSHA standards
Other appropriate safety standards
Consensus safety standards

Bloodborne Pathogen Exposure for Collateral Jobs

Plan
Training
Bio-Hazards Kit
OSHA standards
Other appropriate safety standards
Consensus safety standards

Boilers

Inspections
Certificate
Maintenance

Compressed Gas Cylinders

Utilization
Storage
OSHA standards
Other appropriate safety standards
Consensus safety standards

Documentation

Emergency equipment maintenance
  Fire extinguishers, emergency lights, exit signs, etc.
Emergency eye wash stations
Emergency telephone numbers
Emergency drills
Employee safety training records
Equipment and tool maintenance
Hazardous materials and chemicals
Lockout/tagout procedures
Monthly safety inspections of classrooms (ATCs)
Monthly Safety inspections of school and labs (ATCs)
OSHA Recordkeeping
Respirator program
Semi-Annual Safety Checklist (ATCs)
Student Statement of Safety Instruction (ATCs)
Tornado Survey Checklist

Used motor oil recovery and disposal

Electrical

Equipment
Switches
Breakers
Fuses
Switch boxes
Circuits
Insulation
Extension cords
Tools
Motors
Grounding
NFPA National Electrical Code
NFPA Standards for Electrical Safety in the Workplace
OSHA standards
Other appropriate safety standards
Consensus safety standards

Emergency Action Plan

Communications
Drills
Emergency Floor Plan
Employee accounting following an evacuation
Evacuations
In-place shelter
Warning
Rescue and medical
Reporting
OSHA standards
Other appropriate safety standards
Consensus safety standards

Fire Safety and Prevention

Egress and exits
Fire alarms
Fire extinguishers
Fire prevention
Fire department connections
Fire fighting by employees
Smoke, fire, and heat detection systems
Smoking policy
Electrical safety

Sprinkler system maintenance and testing
Storage and use of flammable and combustible materials

First Aid

Eye wash stations
First aid programs
First aid supplies
Bloodborne Pathogen Program
OSHA standards
Other appropriate safety standards
Consensus safety standards
Cabinet policy

Flammable and Combustible Liquids

Use
Storage
Disposal
Kentucky Fire Code
Local Fire Code
OSHA standards, other appropriate safety standards, consensus safety standards

Guarding Floors, Platforms, and Weight Capacity (Fall Protection)

OSHA standards
Other appropriate safety standards
Consensus safety standards

Hazardous Materials and Waste

Storage
Use
Handling
Transportation
Spills
Disposals
Quantities
MSDS
Labeling
Toxicity and other harmful effects
Warning Signs
Supervision
Training
Personal protective equipment
OSHA standards
Other appropriate safety standards

Consensus safety standards

Housekeeping

Waste disposal
Cleaning chemicals and products
MSDS
Leakage and spillage
Cleaning methods
Storage areas
Dust and dirt control
OSHA standards
Other appropriate safety standards
Consensus safety standards

Jacks/Cranes/Compressors/Lifting Equipment

OSHA standards
Other appropriate safety standards
Consensus safety standards

Ladders

OSHA standards
Other appropriate safety standards
Consensus safety standards

Lockout/Tagout

Established program
Training
Necessary equipment
OSHA standards
Other appropriate safety standards
Consensus safety standards

Machine Safety

Points of operation
Flywheels
Gears
Shafts
Pulleys
Key ways
Belts
Couplings
Sprockets

Chains
Frames
Controls
Lighting for tools and equipment
Brakes
Exhausting
Feeding
Oiling
Adjusting
Maintenance
Lockout/tagout
Grounding
Workspace
Location
Purchasing standards
OSHA standards
Other appropriate safety standards
Consensus safety standards

Materials Handling

OSHA standards
Other appropriate safety standards
Consensus safety standards

Office Safety

OSHA standards
Other appropriate safety standards
Consensus safety standards

Permit Required Confined Spaces

OSHA standards
Other appropriate safety standards
Consensus safety standards

Personal Protective Equipment

Type
Size
Maintenance
Repair
Age
Storage
Assignment of responsibility
Purchasing standards

Compliance with safety standards
Training in care and use
OSHA standards
Other appropriate safety standards
Consensus safety standards

Powered Industrial Trucks (Fork Lifts)

Training
Documentation of training
Operations
Storage
Selection of unit
Fire safety
OSHA standards
Other appropriate safety standards
Consensus safety standards
Cabinet policy

Signage

OSHA standards
Other appropriate safety standards
Consensus safety standards
Cabinet policy

Training

Asbestos
Back Safety
Bloodborne pathogens
Crime awareness and security
Workplace and school violence
Property Safety and Protection
Drills
  Fire
  Tornado
  Earthquake
  Lockdown
Emergency Actions Plan
Fire prevention
First aid
Forklift
Hazard communication
Lockout/tagout
Respirator
Safety Committees and inspections

Other training as needed
OSHA standards
Walking and Work Surfaces

Floors
Walls
Ceilings
Exits access
Stairs
Walkways
Ramps
Platforms
Drives
OSHA standards
Other appropriate safety standards
Consensus safety standards
Cabinet policy

Conclusion

Occupational safety and health experts, Industrial Hygienists, ergonomists, industrial engineers, and other trained individuals believe that at least one-half of all workplace safety and health problems could be reduced or controlled by effective safety and health management. Those experts can learn to anticipate, recognize, and control what might go wrong and alter the tools or the environment to make the job safer.

Linking Kentucky and Federal Occupational Health and Safety Statutes and Standards

Safety Audits

When a Safety Audit is conducted, NFPA 1, 10, and 101 (Kentucky Fire Code) should be considered along with OSHA standards. In most cases, OSHA uses *NFPA standards* in their standards. However, NFPA probably addresses some standards that OSHA does not; therefore, both sets of standards (OSHA and NFPA) shall be considered during a Safety Audit. **(E-Mail from State Fire Marshal's Office dated October 27, 2003)**

815 KAR 10:060, Kentucky Standards of Safety (Kentucky Fire Code) states that NFPA 1 and other NFPA standards are incorporated by reference. According to the Kentucky Fire Code, the fire prevention, life safety, and building code standards incorporated by reference "shall" be deemed safe practices and "shall" be deemed safe practices and "shall" be used to comply with the standards. **(815 KAR 10:060 Kentucky Standards of Safety (Kentucky Fire Code)**

New Building Construction and Alterations

815 KAR 10:060, Kentucky Standards of Safety (Kentucky Fire Code) states the *Kentucky Building Code* "shall apply" to a new building and to an alteration, addition or change of use in accordance with the regulations. **(815 KAR 10:060 Kentucky Standards of Safety (Kentucky Fire Code)**

NFPA 101 *Life Safety Code* is not a building code; however, some of the requirements for health care facilities, prisons, and day care centers have been included in the Kentucky Building Code. **(E-Mail from State Fire Marshal's Office dated October 27, 2003)**

Existing Buildings (Constructed Under the Kentucky Building Code and Those Not Constructed Under the Code)

The State Fire Marshall and the Local Fire Code Enforcement Official shall continue to be the authorities having jurisdiction for enforcement of Kentucky Standards of Safety (Kentucky Fire Code) in existing buildings not regulated by the Kentucky Building Code, and for continued fire safety in buildings constructed and approved under the code. **(Kentucky Building Code 2003 Supplement, Page 1)**

Kentucky Occupational Health and Safety Statutes and Standards

Kentucky's Occupational Safety and Health Statute applies to all employees, employers, and places of employment except for employees of the United States Government or those employees, employers, and places of employment over which federal agencies other than federal OSHA have occupational safety and health standards or regulations. **(KRS Chapter 338 Occupational Health and Safety)**

State agency safety programs must comply with the State Safety Program, and the State Safety Program must comply with the requirements of KRS Chapter 338 and the Administrative Regulations promulgated by Kentucky OSHA. **(101 KAR 2:150 State Safety Program)**

Each agency, board or commission of state government, unless the requirement is waived, shall develop Emergency Operations Procedures which are consistent with and which meet the requirements of the Kentucky Emergency Operations Plan. Agency Emergency Operations Procedures shall be updated not less than yearly. **(KRS Chapter 39A.220 Agency Emergency Operations Procedures, 1998)**

Kentucky OSHA Standards consist of:

Regulations specific to Kentucky;
Kentucky amendments to federal OSHA Standards; and
Federal OSHA General Industry and Construction Industry Standards that have been adopted by Kentucky OSHA.

Therefore, the Kentucky OSHA Standards should be consulted, not only the federal OSHA Standards. **(Kentucky Occupational Safety and Health Standards for the Construction Industry, 2005 Edition and Kentucky Occupational Safety and Health Standards for General Industry, 2005 Edition)**
NOTE: Since Kentucky is a "plan state" it administers its own occupational health and safety program. There will be little enforcement by federal OSHA; it is the responsibility (except in some situations reserved by federal OSHA) of Kentucky OSHA. **(Discussions with Kentucky OSHA Staff and Training Classes)**

Both NFPA 1 (Kentucky Fire Code) and OSHA Standards are enforced in existing buildings (constructed under the State Building Code or not constructed under the code). As a general rule, when OSHA Standards and NFPA 1 are in regulatory conflict, the most stringent is enforced. **(Kentucky Building Code 2003 Supplement Page 1 and E-Mail from State Fire Marshal's Office dated October 27, 2003)**

OSHA Using the General Duty Clause to Cite Consensus Standards

In situations where OSHA has not adopted a specific safety and health standard, Section 5(a) (1) of the federal OSH Act (General Duty Clause) may be applicable. Section 5(a) (1) states: *Each employer shall furnish to each of his employees employment and a place of employment which are free from recognized hazards that are causing or likely to cause death or serious physical harm to his employees."*

A consensus standard may serve as evidence of industry recognition of a hazard; however, OSHA does not issue a citation pursuant to the General Duty Clause when an existing standard addresses the relevant hazard.

Kentucky and Federal OSHA Jurisdiction in Kentucky Department of Military Affairs

Kentucky OSHA covers state and local government facilities and operations. Kentucky OSHA has jurisdiction over all non-government activities of employers and places of employment except:

TVA facilities,
Private sector maritime,
Military bases,
Property ceded to the U.S. Government.

Most property and buildings in the Kentucky Department of Military Affairs are state owned. Kentucky OSHA has jurisdiction over non-unique military systems and operations.

Federal OSHA has jurisdiction in Kentucky over:

TVA facilities,
Private sector maritime,
Military bases and other property ceded to the U.S. Government except military personnel and uniquely military equipment, systems, and operations.

Excludes such as:

Military aircraft,
Military ships,
Submarines.
Missiles and missile sites,
Early warning systems,
Military space systems,
Artillery,
Tanks,
Tactical vehicles,
Field maneuvers,
Naval operations,
Military flight operations,
Associated research, test, and development activities,
Actions required under emergency conditions.

Includes workplaces and operations comparable to those of industry and private sector such as:

Vessel, aircraft, and vehicle repair,
Overhaul,
Modification (except for equipment trials),
Construction,
Supply services,
Civil engineering of public works,

Office work. **(Executive Order 12196, February 26, 1980, Posting of the OSHA Notice; Jurisdiction Over State and Military Personnel)**

Shared Jurisdiction

Where enforcement jurisdiction is shared between federal and Kentucky OSHA for a particular area, project or facility, federal jurisdiction may be assumed for the entire project or facility. Based on an agreement between Kentucky and federal OSHA.

References

101 KAR 2:150 State Safety Program.

803 Kentucky Administrative Regulations 2:050, Kentucky OSHA Regulations.

815 KAR 10:060 Kentucky Standards of Safety (Kentucky Fire Code).

Discussions with Kentucky OSHA Staff and Training Classes.

Executive Order 12196, February 26, 1980: Posting of the OSHA Notice, Jurisdiction Over State and Military Personnel.

Federal OSHA Act.

Kentucky Building Code 2003 Supplement, Page 1.

Kentucky Occupational Safety and Health Standards for General Industry.

Kentucky Occupational Safety and Health Standards for the Construction Industry.

Kentucky OSHA Program, Safety and Health Guidelines.

Kentucky Revised Statutes Chapter 338, Kentucky OSHA Act.

KRS Chapter 338 Kentucky OSHA Code.

KRS Chapter 338 Occupational Health and Safety.

KRS Chapter 39A.220 Agency Emergency Operations Procedures, 1998.

National Fire Prevention Association (NFPA) Code 1 (Kentucky Fire Code), 2006 Edition.

The Hartford Loss Control Department, "Outline of A Model Safety Program" 2002.

U.S. Department of Labor Occupational Safety and Health Administration, "OSHA Construction e-Tool Safety and Health Program", Washington, D.C.

U.S. Department of Labor Occupational Safety and Health Administration, "OSHA Four Point Workplace Program.

U.S. Department of Labor, Occupational Safety and Health Administration, "General Industry Quick Start", Washington, D.C.

U.S. Department of Labor. Occupational Safety and Health Administration, "Ergonomics: The Study of Work Bulletin 3125", Washington, D.C., U.S. Government Printing Office, 1991.

U.S. Department of Labor. Occupational Safety and Health Administration, "Safety and Health Program Management Guidelines", Published Federal Register, Thursday, January 26, 1989.

Safety Keys

Incident Management

- Investigations of accidents and near misses.
- Management of claims from employees.
- Return-to-Work.
- Find root cause(s).

Prevention

- Elimination of accidents, near misses, accidents, and illnesses.
- Proactive before the event:
  - Training,
  - Safety inspections and audits,
  - Belief in zero accidents,
  - Strategy to prevent accidents from occurring.

Compliance

- Who-All employees and management.
- What-Elimination of unsafe actions and situations.
- Where-All offices, departments, sections, etc.
- When-Every day,
- How-Training, inspections, knowing and applying standards and codes.
- Why-Employees go home safe.

Safety Awareness

- 100% predictable.
- 100% preventable.
- 100% unacceptable:
  - Injuries to employees,
  - Destruction of property,
  - Expensive,
  - Can be prevented, and
  - Should be prevented.

Due Diligence in Occupational Health and Safety

Due diligence is the level of judgment, care, prudence, determination that a person would reasonably be expected to do under particular circumstances.

Applied to Occupation Health and Safety, due diligence means that an employer takes all reasonable precautions, under the particular circumstances, to prevent injuries or accidents in the workplace. This duty also applies to situations that are not addressed elsewhere in safety codes and standards.

To exercise due diligence, an employer must implement a plan to identify possible workplace hazards and carry out appropriate corrective action to prevent accidents or injuries arising from these hazards. An employer must be able to prove that all precautions, reasonable under the circumstances, were taken to protect the safety and health of employees.

Establishing Due Diligence in Occupational Health and Safety

Due Diligence is Demonstrated by Employer's Actions Before and Event Occurs, Not After

1. Written safety policies, practices and procedures demonstrate and document that an employer completed safety audits, identified hazardous practices and conditions, and made necessary changes to correct the hazards.

2. Information must be provided to employees to enable them to work safely. Appropriate training and education is to be provided to employees so that they understand and carry out their work according to the established policies, practices, and procedures.

3. Supervisors must also be trained to ensure they know their responsibilities under safety codes and standards.

4. The workplace is to be monitored to ensure employees are following the policies, practices, and procedures.

5. Employees are to take reasonable care to ensure the safety of themselves and their coworkers; this includes following appropriate safety and health codes and standards.

6. Employers are to have an accident investigation and reporting system.

7. Employers are to document, in writing, all steps and procedures taken to implement the Occupational Safety and Health Program. This documentation provides a history of the safety program as well as up-to-date documentation of due diligence.

Education and Workforce Development Cabinet
Occupational Health and Safety Program

Applicability of Safety Standards to Education Cabinet Facilities

The standards of the Kentucky Occupational Safety and Health (Ky OSH) Program and Kentucky Fire Code apply to all Education Cabinet facilities in the identification and correction of occupational health and safety hazards. Also, appropriate consensus safety standards and recognized safety hazards are utilized to identify and mitigate hazards.

Applicability of Safety Standards to Area Technology Center

The standards of Ky OSH do not apply to students of Area Technology Centers; however, the standards do apply to all employees. In addition, the State Fire Code applies to such facilities. In the absence of established, referenced safety standards for ATC students, the Education Cabinet Safety Program utilizes the nationally recognized OSHA standards adopted by Ky OSH and Fire Code for both employees and students. Also, appropriate consensus standards and recognized hazards are utilized to identify and correct hazards.

The principle is that if the staff and instructors are safe, the students will also be protected. In addition, using the OSH and OSHA standards in ATCs educate students in safe working practices that will be followed in the workplace.

Program Principles

P1	Most workplace and educational program area accidents and injuries are preventable.
P2	If the staff and instructors of Area Technology Centers are safe, the students will also be protected
P3	Each office, facility, Area Technology Center, and unit of the Education and Workforce Development Cabinet shall implement an Occupational Health and Safety Program to minimize workplace and instructional area accidents and illness.
P4	Safety program includes employees, students, visitors, vendors, and consumers of all cabinet facilities, and ATCs.
P5	Management at all levels defines, initiates, and maintains programs and procedures to prevent occupational injuries and illness.
P6	There will be ongoing reviews and audits of safety programs, hazards, and corrective measures.
P7	There will be ongoing safety training of employees and Area Technology Center students.

Objectives to Implement Program Principles

O1	Maintain a Safety Program management system.
O2	Prevent occupational injuries and illness among employees, Area Technology Center Students, vendors, and consumers at all cabinet facilities and operations.
O3	Increase occupational health and safety awareness among cabinet employees.
O4	Identify federal, state, and consensus safety standards that apply to cabinet operations.
O5	Conduct safety audits with reports containing recommendations to improve safety

	and to correct identified deficiencies. Reports will be sent to appropriate management for action.
O6	Organize and maintain Occupational Health and Safety Programs in all cabinet offices, facilities, and Area Technology Centers to include all program areas, employees, consumers, vendors, visitors, and students.
O7	Provide or arrange for safety training for employees.
O8	Provide staff support to management and employees, e.g. research questions, provide guidance documents, etc.

Element 1: Management Commitment and Employee Involvement

E1-1	Establish policy and procedures and communicate the program to staff, employees, and students.
	Implementation
	Written policy on safety communicated to staff, employees, and students.
	Job descriptions include safety and health responsibilities.
	Evidence of employee involvement in safety and health decisions.

Element 2: Work Site Analysis

E2-1	Safety Audits of job sites and workplaces to ensure compliance with consensus, federal, state, local standards, and/or agency policy requirements. Formal reports are prepared and forwarded to appropriate management and staff.
E2-2	Safety Audits of machinery, equipment, and/or structures for compliance with applicable safety and/or health codes with recommendations to enhance safety and health.
E2-3	Data base of inventory of emergency equipment, inspections, and training maintained and updated when necessary.
E2-4	Interpretation and/or application of regulations, policies, procedures, and/or other source materials dealing with occupational safety and/or health.
E2-5	Accident and/or incident data maintained on OSHA required forms for analysis of trends to identify specific areas where additional training and/or corrective measures are needed.
E2-6	Accidents are reported and documented based on established procedures.
E2-7	Accident and/or incident investigations are conducted when involving employees, customers, visitors, vendors, and ATC students; includes previous reports of safety and/or health violations and/or investigative results with recommended corrective actions.
E2-8	Reviews of reports and/or other documents for compliance with agency policy and procedures.
	Implementation
	Safety Audits of job sites and workplaces to ensure compliance with federal, state, local standards and/or agency policy requirements. Formal reports are prepared and forwarded to appropriate management and staff for corrective

	actions.
	Safety Audits of machinery, equipment and/or structures for compliance with applicable safety and/or health standards to include recommendations to enhance occupational safety and health. Formal reports are prepared and forwarded to appropriate management and staff for corrective actions.
	Safety Audits include hazard corrections required and when completed.
	Response to programmatic inquiries from staff and/or others.
	Accident Investigation Reports with hazard corrections noted.

Element 3, Part 1: Hazard Prevention and Control-Written Safety Program

E3.1.1	Federal, State, and Cabinet Policies
E3.1.2	Hazard Analysis for Cabinet
E3.1.4	Goals
E3.1.5	Objectives
E3.1.6	Program Organization
E3.1.7	Program Description by Program

Element 3, Part 2: Hazard Prevention and Control-Minimum Safety Program

	Safety Program Implementation Programs
E3.2.1	Accident Reporting and Recordkeeping Program
E3.2.2	Automated External Defibrillator Program
E3.2.3	Back Safety Program
E3.2.4	Cleaning Chemical Safety Program
E3.2.5	Documentation Program
E3.2.6	Emergency Action Plan Program-Based on identified hazards.
E3.2.6.1	Emergency Action Procedures-steps for quick response in an emergency.
E3.2.6.2	Emergency phone numbers (fire, police, ems,etc) posted in conspicuous places, near telephones and/or notice boards. May be 911 only.
E3.2.6.3	Emergency Floor Plans posted in conspicuous places.
E3.2.6.4	Emergency drills conducted on a regular basis with documentation.
E3.2.6.5	Infection Control Program-Bio-Hazard Clean-up Procedures
E3.2.7	Exits and Egress Program
E3.2.8	Fall Protection Program-Guarding Floors, Platforms, and Weight Capacity
E3.2.9	Fire Extinguisher Program
E3.2.10	Fire Prevention Program
E3.2.11	First Aid Program
E3.2.12	Hazard Communication Program
E3.2.13	Hearing Conservation Program
E3.2.14	Indoor Air Quality Program
E3.2.15	Infection Control Program-Bloodborne Pathogen Exposure for Collateral Jobs
E3.2.16	Infection Control Program-Bloodborne Pathogen Occupational Exposure
E3.2.17	Inspection Program
E3.2.18	Notices and Posters Program
E3.2.19	Signage Program
E3.2.20	Training Program
E3.2.21	Workplace Violence Prevention Program

Element 4: Training for Employees, Supervisors, and Managers

E4-1	Training of employees in occupational safety and/or health programs.
E4-2	Training of staff to use instructional materials.
E4-3	Training of staff in CPR and first aid.
	Implementation
	Develop and revise as necessary training topics with course content.
	Maintain attendance lists in data base
	Maintain employee training records.
	Conduct safety classes based on identified topics and identified needs.

Training Topics
Aerial Lift and Scaffold Safety
Asbestos Awareness Course
Back Safety
Bloodborne and Body Fluid Borne Pathogens
Compressed Gas Safety
Electrical Hazards
Emergency Drills
Ergonomics
Fall Protection for General Industry and Maintenance
Fire Extinguishers
Fire Protection
First Aid
Forklift
Hand and Powered Tool Safety
Hazard Communication
Ladder Safety
Lockdown
Lockout/Tagout
Machine Safeguarding
Mosquito, Tick, and Spider Diseases
Outdoor Equipment Safety
Personal Protective Equipment
Workplace Violence Prevention

Element 5: Safety Documentation

E5-1	Safety documentation is used to record, reference, and support conditions, actions, and results of the Safety Program.

Types of Documentation
Accident Reporting-Accident reporting is a method for identifying hazards focusing on finding the root causes. All accidents and incidents are to be investigated; "near misses" are considered an incident because, given a slight change in time or position, injury or damage could have occurred. Every work related or workplace injury occurring in a cabinet facility or program area, regardless of its severity, must be

reported based on specific instructions.
Emergency Action Plan (EAP)-An EAP is to facilitate and organize employer and employee actions during workplace emergencies. The elements of an EAP must include, but are not limited to: Means of reporting fires and other emergencies; Evacuation procedures and emergency escape route assignments; Procedures to be followed by employees who remain to operate critical plant operations; Procedures to account for all employees after an employee evacuation has been completed; Rescue and medical duties for those employees who are to perform them; and Names or job titles of persons who can be contacted for further information or explanation under the EAP.
Emergency Equipment Inspections
Bio-Hazard Kits-Biohazard Kits are to receive an inspection by office/ facility staff at 30 day intervals with each inspection documented.
Emergency Lights-Emergency lights are to receive a functional test by office/facility staff at 30 day intervals for not less than 30 seconds with each test document.
Exit Signs-Exit signs are to receive a functional test by office/facility staff at 30 day intervals with each inspection documented.
Fire Alarm Pull Stations-The inspection and testing of fire alarm pull stations shall be conducted in accordance with State Fire Code Standards. Written documentation of the inspection and service must be maintained by the building owner.
Fire Blankets-Fire blankets are to receive an inspection by appropriate personnel at 30 day intervals with each inspection documented.
Fire Extinguishers-Fire extinguishers shall be inspected by office/facility staff at 30 day intervals with written documentation, which is attached to each extinguisher.
Fire Sprinklers-The inspection and testing of fire sprinklers shall be conducted in accordance with State Fire Code Standards. Written documentation of the inspection and service must be maintained by the building owner.
First Aid Kits-First Aid Kits are to receive an inspection by office/facility staff at 30 day intervals with each inspection documented.
Heat and Smoke Detectors-The inspection and testing of heat and smoke detectors shall be conducted in accordance with State Fire Code Standards. Written documentation of the inspection and service must be maintained by the building owner.
Personal Protective Equipment-All items of PPE are to receive an inspection by appropriate personnel at 30 day intervals with each inspection documented.
Emergency Eyewash Activation Tests-Emergency Eye stations are to receive a functional test and inspection by appropriate Area Technology Center personnel weekly for not less than 30 seconds with each test and inspection documented.
Employee Safety Training Records-Documentation maintained to verify that employees have received all required safety training.
Equipment Inspection and Maintenance Records-Each Area Technology Center instructor shall keep a record of all required, scheduled inspections and required maintenance completed on program equipment. The Maintenance Inspection Record shall identify the specific piece of equipment, date of inspection, equipment defect, corrective action, and date the equipment was repaired and returned to service.
Fire Marshall Inspections-Inspections conducted by the Kentucky Fire Marshal with documentation of necessary corrections shall be maintained by office/facility management.
Fire, Earthquake, Tornado, and Lockdown Drill Record-Facility management is responsible for maintaining a record of the dates, times the alarm sounded, the time it

took to complete emergency procedures, weather conditions, number of occupants, and any irregularities noted for fire, earthquake, tornado, and lockdown drills.
Hazardous Chemical Inventory-A complete inventory of all chemicals maintained in a facility must be prepared and available.
Hazardous Chemical Material Safety Data Sheets-Chemical manufacturers and importers shall obtain or develop a Material Safety Data Sheet for each hazardous chemical they produce or import. Employers shall have a Material Safety Data Sheet in the workplace for each hazardous chemical which they use.
Health Department Inspections-Inspections conducted by the local health department with documentation of necessary corrections shall be maintained by office/facility management.
Lockout/Tagout Procedures-Certain items of equipment are to be locked or tagged out when maintenance is preformed. Documentation provides guidance on the types of equipment under the Lockout/Tagout Standard.
Monthly Safety Inspection of Classrooms-Documentation of the monthly inspection of ATC classrooms and laboratories completed by each program's Safety Committee.
Notices and Posters-The following notice and posters are required to be posted in public/employee accessible locations in all Cabinet facilities: Child Labor Law; Employee Polygraph Protection Act; Equal Employment Opportunity; Fair Employment; Family and Medical Leave Act; Minimum Wage; OSHA Job Safety and Health Protection; Public Accommodation; Unemployment Insurance; Uniformed Services Employment and Reemployment Rights Act; and any additional postings required by state and/or federal standards.
OSHA 300 Log-All Cabinet facilities shall maintain an OSHA 300 Log on a calendar year basis (January-December). The log is to be kept on file for five year following the end of the calendar year to which it relates.
OSHA 300A Summary-At the end of the calendar year, the OSHA 300A Summary of Work-Related Injuries and Illnesses shall be completed by each facility manager using the information from the OSHA 300 Log. The OSHA 300A Summary is to be posted in a public location in the facility from February 1 to April 30.
Respirator Program Evaluation-This form is used in the Respirator Program to evaluate each job annually, with program adjustments made to reflect evaluation results.
Tornado Survey Checklist-Each Cabinet facility shall have on file a Tornado Survey Checklist; identifying critical facility information and the communication system available to notify all persons in the facility of a weather alert.
Training Records-Documents work related training received by employees. Includes location, instructor, date, topics, and participants.
Used Motor Oil Recovery and Disposal-Waste oil must be properly stored in labeled containers and a log maintained to record the amount of oil added to the container. Once the container is filled, a certified used oil hauler shall be contacted to remove the oil. Receipts for all oil picked up shall be filed in the administrative office along with the log.

Safety Program Implementation Programs

Accident Reporting and Recordkeeping Program
Every work related injury in a cabinet facility or program area, regardless of its severity, must be reported and recorded based on specific Ky OSH and Cabinet Standards. Reporting includes employees, customers, visitors, vendors, and students. All accidents, regardless of how minor, shall be reported on the Education and Workforce Development Cabinet Accident Report Form.
Implementation
Accident Reporting and Recordkeeping for Employees, Customers, and Area Technology Center students
Education Cabinet Accident Report Form
OSHA forms:
Form 300-Log of Work Related Injuries and Illness
Form 300A-Summary of Work Related Injuries and Illness
Ky OSH recording criteria
Workers Compensation-First Report of Injury of Illness
Automated External Defibrillator Program
The AED Program is to increase the rate of survival of people who have sudden cardiac arrest. Cabinet facilities are not required to have an Automated external Defibrillator; however, if there is a unit located in a facility, all requirements directed in KRS 311.667 must be in place and implemented.
Implementation
Coordination and reporting with EMS
Documentation
Equipment testing and maintenance
Legal requirements
Medical oversight
Program administration and monitoring
Training
Back Safety Program
The Back Safety Program identifies hazards to employees' backs in the workplace and implements feasible engineering, administrative, and/or protective devices.
Implementation
Consensus safety standards
Ky OSH standards
Hazard Identification
Cleaning Chemical Safety Program
A formal, documented, program that ensures management, supervisors, janitorial staff, and building occupants are aware of the precautions and procedures to prevent cleaning chemical injuries.
Implementation
Consensus safety standards
Hazard Identification
Ky OSH standards
Program monitoring
Provisions to protect employees from chemicals
Storage

Training
Inventory and Material Safety Data Sheets
Control of Hazardous Energy (Lockout/Tagout Program)
The Lockout/Tagout Program safeguards employees and ATC students from hazardous energy while performing service or maintenance on machines and equipment. Program identifies practices and procedures necessary to lock or tag out machinery to control the release of stored energy.
Implementation
Consensus safety standards
Documentation
Identification of tasks and performance requirements
Necessary equipment
Ky OSH standards
Other appropriate safety standards
Program monitoring
Training
Compressed Gas Cylinders Program (includes Outdoor Storage Program)
Standards for the safety and environmentally responsible use, storage, and transport of compressed gas cylinders.
Implementation
Consensus safety standards
Documentation and monitoring
Identification of tasks and performance requirements
Ky OSH standards
Provisions to protect employees
Storage
Utilization
Egress and Exit/Employee Warning System Program
The Egress and Exit/Employee Warning System Program complies with the Kentucky Fire Code and Ky OSH standards for the placement, inspection, maintenance, and employee training of exit routes, exit discharges, exit access, and employee warning systems.
Implementation
Consensus safety standards
Documentation and monitoring
Kentucky Fire Code
Emergency Action Plan Program
An Emergency Action Plan (EAP) is to facilitate and organize employer and employee actions during workplace emergencies. The elements of an EAP must include, but are not limited to: Means of reporting fires and other emergencies; Evacuation procedures and emergency escape route assignments; Procedures to be followed by employees who remain to operate critical plant operations; Procedures to account for all employees after an employee evacuation has been completed; Rescue and medical duties for those employees who are to perform them; and Names or job titles of persons who can be contacted for further information or explanation under the EAP.
Implementation
Communications
Consensus safety standards

Drills
Emergency Floor Plan
Hazard Identification
Evacuations and employee accounting following an evacuation
In-place shelter
Ky OSH standards
Reporting
Rescue and medical
Warning
Fire Extinguisher Program
The Fire Extinguisher Program complies with the Kentucky Fire Code and Ky OSH standards for the placement, inspection, service, maintenance, and employee training of fire extinguishers.
Implementation
Annual maintenance
Employee training
Monthly inspections and program monitoring
Placement of fire extinguishers
Fire Protection Program
The Fire Protection Program provides a fire safe working environment by identifying and eliminating potential fire hazards through consistent and comprehensive fire and safety inspections emphasizing compliance with all applicable State Fire Code, Ky OSH standards, and consensus standards.
Implementation
Documentation and program monitoring
Egress and exits
Electrical safety
Fire alarms
Fire department connections
Fire extinguishers
Fire fighting by employees
Fire prevention
Identification of tasks and performance requirements
Smoke, fire, and heat detection systems
Smoking policy
Sprinkler system maintenance and testing
Storage and use of flammable and combustible materials
Training
First Aid Program
The First Aid Program provides the training and resources to provide emergency treatment to an injured or sick person before professional medical care is available.
Emergency Eye Wash Stations
Emergency eyewash station standards establish minimum performance and use requirements for eyewash and shower equipment. Ky OSH standards require emergency eyewash stations where the eyes or body of any person may be exposed to corrosive materials. Ky OSH standards require emergency eyewash stations where the eyes or body of any person may be exposed non-corrosive hazardous chemicals and particulate hazards.

Implementation
Cabinet policy
Consensus safety standards
Documentation and program monitoring
Eye wash stations
First aid programs
First aid supplies
Infection control
Ky OSH standards
Other appropriate safety standards
Flammable and Combustible Liquids Program
The Flammable and Combustible Liquids Program maintains the proper storage and use of flammable liquids to significantly reduce the possibility of accidental fires and injuries to employees. To minimize the risk to life and property the requirements of the State Fire Code and Ky OSH standards are implemented. Material Safety Data Sheets for flammable and combustible liquids are maintained where necessary.
Implementation
Consensus safety standards
Disposal
Identification of tasks and performance requirements
Kentucky Fire Code
Local Fire Code
Ky OSH standards
Program monitoring
Storage
Training
Use
Guarding Floors, Platforms, and Weight Capacity (Fall Protection) Program
Fall Protection Program is to identify and evaluate fall hazards to which employees will be exposed, and to provide specific training.
Implementation
Consensus safety standards
Identification of tasks and performance requirements
Ky OSH standards
Hand and Portable Power Tools Safety Program
The Tool Safety Program provides safety procedures and safeguards associated with hand and portable power tools.
Implementation
Consensus safety standards
Identification of tasks and performance requirements
Ky OSH standards
Other appropriate safety standards
Program monitoring.
Hazard Communication Program
The HCP establishes standards to ensure that the hazards of all chemicals produced or imported are evaluated and that information concerning the hazards is transmitted to employees and employers. It is to be accomplished by a written Hazard

Communication Program.
Implementation
Written Hazardous Communication Program
Material Safety Data Sheets available to employees and ATC students.
Container labeling.
Complete inventory of hazardous materials and chemicals.
Employee and ATC student training.
Consensus safety standards
Contractor information
Handling
Ky OSH standards
Personal protective equipment
Quantities
Supervision
Toxicity and other harmful effects
Training
Hazardous Materials and Waste Program
All hazardous materials, as defined by the Environmental Protection Agency, Occupational Safety and Health Administration, and/or state regulatory agencies, shall be handled in a manner which poses no substantial hazard to human health or the environment and is in accordance with state and federal standards.
Implementation
Consensus safety standards
Disposals
Handling
Identification of tasks and performance requirements
Labeling
Material Safety Data Sheets
Ky OSH standards
Personal protective equipment
Program monitoring
Quantities
Spills
Storage
Supervision
Toxicity and other harmful effects
Training
Transportation
Use
Warning Signs
Hearing Conservation Program
The Hearing Conservation Program identifies exposure to excessive noise in the workplace and if present, implements feasible engineering, administrative, and/or protective devices for employees, students, customers, visitors, and/or vendors.
Implementation
ATC Hearing Conservation Program
Audiometric testing
Documentation and program monitoring

Hearing protection
Identification of tasks and performance requirements
Noise exposure assessment
Ky OSH Hearing Conservation Program
Ky OSH standards
Personal Protective Equipment
Written program
Housekeeping Program
Housekeeping is more than just cleaning; it involves 1) actions to prevent dirt from entering the environment as well as its removal once it is there; 2) choices of products and methods that minimize the introduction of pollutants into the environment that the Housekeeping Program is designed to clean; 3) tasks designed for health and safety as well as tasks designed for appearance; and 4) training and monitoring performance.
Implementation
Cleaning chemicals and products
Cleaning methods
Consensus safety standards
Dust and dirt control
Identification of tasks and performance requirements
Inspection and monitoring of the cleaning process
Leakage and spillage
Methods to reduce the introduction of dirt into the environment to be cleaned
Material Safety Data Sheets
Ky OSH standards
Storage areas
Training of cleaning personnel
Waste disposal
Indoor Air Quality Program
The Indoor Air Quality Program provides standards and guidelines on the factors that contribute to indoor air quality and comfort problems and the responsibilities of management and employees in maintaining a good indoor environment.
Implementation
Cleaning chemicals and products
Cleaning methods
Consensus safety standards
Dust and dirt control
Identification of tasks and performance requirements
Inspection and monitoring results
Leakage and spillage
Material Safety Data Sheets
Ky OSH standards
Storage areas
Waste disposal
Infection Control Program-Bloodborne Pathogen Exposure
The Infection Control Program details the standards to identify those jobs and takes where occupational exposure to blood or other potentially infectious materials occur and describes how the employee will protect the identified employees. The facility's

program is to be written.
Implementation
Bio-Hazards Kit
Consensus safety standards
Documentation and program monitoring
Ky OSH standards
Training
Written program
Jacks/Cranes/Compressors/Lifting Equipment Program
The Equipment Program provides safety and safeguards associated with jacks, cranes, compressors, and lifting equipment.
Implementation
Consensus safety standards
Documentation
Identification of tasks and performance requirements
Inspection and monitoring results
Ky OSH standards
Ladder Safety Program
The Ladder Safety Program provides safety and safeguards associated with the selection, use, storage, and maintenance of all types of ladders.
Implementation
Consensus safety standards
Identification of tasks and performance requirements
Inspection and monitoring results
Ky OSH standards
Other appropriate safety standards.
Machine Safety Program
The Machine Safety Program identifies the major mechanical hazards of machinery that threatens workers' safety and provides principles of safeguarding.
Whether or not a proper safeguard has been manufactured for a particular application, no mechanical motion that threatens a workers' safety should be left without a safeguard.
Implementation
Adjusting
Belts
Brakes
Chains
Consensus safety standards
Controls
Couplings
Documentation
Exhausting
Feeding
Flywheels
Frames
Gears
Grounding

Identification of tasks and performance requirements
Inspection and monitoring results
Key ways
Lighting for tools and equipment
Location
Lockout/tagout
Maintenance
Oiling
Ky OSH standards
Points of operation
Pulleys
Purchasing standards
Shafts
Sprockets
Workspace
Materials Handling Program
The Materials Handling Program establishes the standards for mechanical handling equipment, secure storage, housekeeping, and clearance limits when handling and storing materials.
Implementation
Consensus safety standards
Identification of tasks and performance requirements
Inspection and monitoring results
Ky OSH standards
Other appropriate safety standards
Outdoor Equipment Program
The Outdoor Equipment Program identifies the major mechanical and environmental hazards of outdoor machinery that threatens workers' safety and provides principles of safeguarding.
Implementation
Consensus safety standards
Documentation
Ky OSH standards
Personal Protective Equipment Program
When engineering, work practices, and administrative controls are not sufficient or feasible, or do not provide sufficient protection, personal protective equipment must be worn by employees and students. Employers must provide the equipment to minimize exposure to a variety of hazards.
ATC Students Requiring Protective Breathing Devices
ATC students who are enrolled in a program which provides instruction in takes requiring the use of protective breathing devices shall have on file a physician's statement of assurance that the individual is physically able to perform the tasks in the program requiring the use of the protective breathing devices. The program instructor shall also have on file a physician's statement of assurance. A written Respirator Program shall be on file for all programs requiring protective breathing devices.

Implementation
Age of PPE
Cabinet Policy
Documentation
Identification of tasks and performance requirements
Inspection and monitoring results
Maintenance
Ky OSH standards
Purchasing standards
Repair
Size
Storage
Training in care and use
Type
Preventive Maintenance Program
Preventive maintenance is the care and servicing by personnel for the purpose of maintaining equipment and facilities in satisfactory condition by providing for systematic inspection, detection, and correction or incipient failures either before they occur or before they develop into major defects.
Implementation
Consensus safety standards
Documentation
Ky OSH standards
Training
Powered Industrial Trucks (Fork Lifts) Program
This program includes the ability to successfully complete classroom and practical training in the proper vehicle operation, the hazards of operating the vehicle in the workplace, and the requirements of the OSHA Standards for powered industrial trucks.
Implementation
Consensus safety standards
Documentation
Fire safety
Identification of tasks and performance requirements
Inspection and monitoring results
Operations
Ky OSH standards
Selection of unit
Storage
Signage and Notices Program
Safety signs shall be posted in program areas, including laboratories and shops, to emphasize the importance of good safety procedures: 1) Asbestos, 2) Auto Lift Safety, 3) Comp0resed Air, 4) Damager-Hands and Fingers, 5) Other as required.
Employee information and notification signs and posters are required to be posted in public/employee accessible locations in all cabinet facilities: 1) Child Labor Law, 2) Employee Polygraph Protection Act, 3) Equal Employment Opportunity, 4) Fair Employment, 5) Family and Medical Leave Act, 6) Minimum Wage, 7) OSHA Job

Safety and Health Protection, 8) Public Accommodation, 9) Unemployment Insurance, 10) Uniformed Services Employment and Reemployment Rights Act, and 11) Any additional postings required by state or federal regulations.
Implementation
Cabinet policy
Consensus safety standards
OSHA and Ky OSH standards
Spray Booth Program
The purpose of the Spray Booth Program is to establish fire, construction, maintenance, student, and staff safety and health requirements for all indoor spray and hand finish booth operations to include: water based materials, flammable or combustible materials, varnishes, lacquers, glues or similar materials.
Implementation
Consensus safety standards
Hazard identification
Inspection and maintenance
Kentucky Fire Code
Ky OSH standards
Personal Protective Equipment
Respiratory Protective Program
Training
Training Program
The Training Program insures that all employees are aware of safety training requirements for their jobs, as well as, the reasons for such training. All safety training is to be documented.
Implementation
Asbestos
Back Safety
Bloodborne pathogens
Crime awareness and security
Documentation
Drills
Fire
Tornado
Earthquake
Lockdown
Emergency Actions Plan
Fire prevention
First aid
Forklift
Hazard communication
Lockout/tagout
OSHA standards
Other training as needed
Property Safety and Protection
Respirator
Safety Committees and inspections
Workplace and school violence

Walking and Work Surfaces Program
Walking and working surfaces, such as floors, stairs, and ladders are associated with slip, trip, and fall accidents.
Implementation
Cabinet policy
Ceilings
Consensus safety standards
Drives
Exits access
Floors
KY OSH standards
Platforms
Ramps
Stairs
Walkways
Walls
Welding Safety Program
Welding, cutting, and brazing are hazardous activities that pose a unique combination of both safety and health risks. Control of welding hazards includes avoiding eye injury, respiratory protection, and ventilation of the work area, protective clothing, and having safe equipment to use.
Implementation
Consensus safety standards
Documentation
Identification of tasks and performance requirements
Inspection and monitoring results
Necessary equipment
Ky OSH standards
Training
Workplace Violence Prevention Program
This program is the approach an office or facility will take in developing plans to prevent and respond to workplace violence. The program does not have to written, but must be communicated to all employees and staff. The procedures are based on the hazards and risks of the particular work location
Implementation
Consensus standards
Documentation
Identification of tasks and performance requirements
Inspection and monitoring results
Training

Minimum Safety Program for a Field Office, Facility or Central Office

Accident Reporting and Recordkeeping

- OSHA Log 300-This OSHA required log records employees' occupational injuries and illnesses. It is maintained, even if there are no injuries, for the calendar year covered by the form. An entry is made for each OSHA recordable injury.

  Reference-OSHA 29 CFR 1910.1904

- OSHA Form 300A-The OSHA required form summarizes and provides statistics of the previous year's occupational injuries and illnesses as recorded on the Form 300. The form is completed no later than January 31 for the previous calendar year and posted February 1 to April 30 with a copy submitted to the Cabinet Safety Coordinator. The form is completed and posted even if there were no injuries for the calendar year covered by the form.

  Reference-OSHA 29 CFR 1910.1904

- Every work related or workplace injury (employees, vendors, visitors, and customers) occurring in a cabinet facility or program area, regardless of its severity, must be reported based on specific procedures. The Education Cabinet Accident Report is used for this reporting.

  Reference-803 KAR 2:180 Section 2

Documentation Program-Emergency Equipment

- Exit signs are to receive a functional test by office or facility staff at 30 day intervals with each test documented.

  References-OSHA 29 CFR 1910.37(a)(4)
  National Fire Prevention Association 1: 14.14.5.2.1

- Emergency lights are to receive a functional test by office or facility staff at 30 day intervals for not less than 30 seconds with each test documented.

  Reference-National Fire Prevention Association 1: 14.13.2.1.1(1) and (4)

- Fire extinguishers shall be inspected by office or facility staff at 30 day intervals with written documentation, which is attached to each extinguisher.

  Reference-OSHA 29 CFR 1910.157(e)(2)

Emergency Action Plan (EAP)-Every cabinet facility is to have an EAP consisting of the following 5 parts.

Emergency Action Procedures-Steps and procedures to be taken in the event of an emergency. The steps and procedures are based on the identified hazards of the facility.

Emergency Phone Numbers-Fire, EMS, Police, etc. are to be posted or provided in conspicuous places, near telephones and/or employee notice boards. The emergency number 911 may be the only number required.

Emergency Floor Plan-The emergency floor plan is to be posted in conspicuous places for use by employees, visitors, vendors, and customers. The emergency floor plan clearly indicates the emergency escape routes, severe weather shelters, Areas of Refuge, and outside assembly points. These plans also include procedures for assisting employees and customers with disabilities.

Emergency Drills-Fire, tornado, and earthquake drills are to be conducted on a regular basis and documented.

Bloodborne Pathogen Control for Collateral Jobs-Legal and safety procedures for the cleanup of human body fluids of all types.

References-OSHA 29 CFR 1910.38(b)
OSHA 29 CFR 1910.39(c)(1) and (2)
OSHA 29 CFR 1910.165(b)(4)
OSHA 29 CFR 1910.1030(b)

Fall Protection Program-Identifies and evaluates fall hazards to which employees will be exposed, and to provide specific training.

Reference-OSHA 29 CFR 1910 Subpart D

Fire Extinguisher Program

The purpose of the Fire Extinguishers Program is to comply with the State Fire Code and Ky OSH standards for the placement, inspection, maintenance, and employee training for fire extinguishers.

References: OSHA 29 CFR 1910.157
National Fire Prevention Association 10: Standard For Portable Fire Extinguishers 2007 Edition.

First Aid Program

Employers with eight or more employees within the establishment shall have persons adequately trained to render first aid and adequate first aid supplies shall be readily available. Other employers shall have adequate first aid supplies readily available and person/persons adequately trained in first aid in the absence of outside treatment facilities.

References-803 KAR 2:310 Section 1(1)
29 CFR 1910.151(a) and (b)
803 KAR 2:310 Section (1)(2)
OSHA 29 CFR 1910.37(a)(4)

Housekeeping Program

Housekeeping is more than just cleaning; it involves 1) actions to prevent dirt from entering the environment as well as it's removal once it is there; 2) selection of products and methods that minimize the introduction of pollutants into the environment that the Housekeeping Program is designed to clean; 3) tasks designed for health and safety as well as tasks designed for appearance; and 4) training and monitoring performance.

Training Program

Each office/facility manager shall implement a safety training program that includes a general safety orientation for all staff upon initial employment and detailed training as required by federal and state safety standards. All training provided to employees must be documented. Suggested training courses with standards are:

- Back Safety, Kentucky Office of Safety and Health, Your Back and Your Job;
- Bloodborne Pathogens, 29 CFR 1910.1030(g)(2)(i), (ii)(A) through (C), (iii) through (vii)(A) through (N), (viii) and (ix)(A) through (C);
- Emergency Drills, 29 CFR 1910.38(c)(2);
- Emergency Action Plan, 29 CFR 1910.38(a)(5)(i), (ii)(a) through (c), and (iii);
- Fire Prevention, 29 CFR 1910.38(b)(4)(i) and (ii);
- Fire Extinguishers, 29 CFR 1910.157(g)(1)-(4)
- Workplace violence, OSHA guidelines, Crime Prevention Through Environmental Design and FBI Workplace Violence Issues in Response.

The Cabinet Safety Coordinator can provide Power Point Presentations and handouts on many of these courses.

Workplace Violence Prevention Program

This program is the approach an office or facility will take in developing plans to prevent and respond to workplace violence. The program does not have to written, but must be communicated to all employees and staff. The procedures are based on the hazards and risks of the particular work location.

References-OSHA guidelines, Crime Prevention Through Environmental Design, and FBI Workplace Violence Issues in Response

Minimum Safety Program for an Area Technology Center Facility

Accident Reporting and Recordkeeping

- OSHA Log 300-This OSHA required log records employees' occupational injuries and illnesses. It is maintained, even if there are no injuries, for the calendar year covered by the form. An entry is made for each OSHA recordable injury.

  Reference-OSHA 29 CFR 1910.1904

- OSHA Form 300A-The OSHA required form summarizes and provides statistics of the previous year's occupational injuries and illnesses as recorded on the Form 300. The form is completed no later than January 31 for the previous calendar year and posted February 1 to April 30 with a copy submitted to the Cabinet Safety Coordinator. The form is completed and posted even if there were no injuries for the calendar year covered by the form.

  Reference-OSHA 29 CFR 1910.1904

- Every work related or workplace injury (employees, vendors, visitors, and customers) occurring in a cabinet facility or program area, regardless of its severity, must be reported based on specific procedures. The Education Cabinet Accident Report is used for this reporting.

  Reference-803 KAR 2:180 Section 2

Back Safety Program

The Back Safety Program determines hazards to employees' backs in the workplace and implements feasible engineering, administrative, and/or protective devices.

Documentation Program-Emergency Equipment

- Exit signs are to receive a functional test by office or facility staff at 30 day intervals with each test documented.

  References-OSHA 29 CFR 1910.37(a)(4)
  National Fire Prevention Association 1: 14.14.5.2.1

- Emergency lights are to receive a functional test by office or facility staff at 30 day intervals for not less than 30 seconds with each test documented.

  Reference-National Fire Prevention Association 1: 14.13.2.1.1(1) and (4)

- Fire extinguishers shall be inspected by office or facility staff at 30 day intervals with written documentation, which is attached to each extinguisher.

  Reference-OSHA 29 CFR 1910.157(e)(2)

Electrical Safety Program

The Electrical Safety Program safeguards employees and ATC students from hazardous energy. Program identifies practices and procedures necessary to install, use, and maintain electrical system components.

References-OSHA 29 CFR Subpart S
National Fire Protection Association, *70E Standard for Electrical Safety in the Workplace*

Egress and Exits Program

The Egress and Exit Program complies with the Kentucky Fire Code and Ky OSH standards for the placement, inspection, maintenance, and employee training of exit routes, exit discharges, exit access, and employee warning systems.

References-OSHA 29 CFR Subpart E
Kentucky Fire Code at NFPA 1

Emergency Action Plan (EAP)-Every cabinet facility is to have an EAP consisting of the following 5 parts. The guidance documentation to prepare an EAP, or review an existing plan, is attached to this e-mail.

Emergency Action Procedures-Steps and procedures to be taken in the event of an emergency. The steps and procedures are based on the identified hazards of the facility.

Emergency Phone Numbers-Fire, EMS, Police, etc. are to be posted or provided in conspicuous places, near telephones and/or employee notice boards. The emergency number 911 may be the only number required.

Emergency Floor Plan-The emergency floor plan is to be posted in conspicuous places for use by employees, visitors, vendors, and customers. The emergency floor plan clearly indicates the emergency escape routes, severe weather shelters, Areas of Refuge, and outside assembly points. These plans also include procedures for assisting employees and customers with disabilities.

Emergency Drills-Fire, tornado, and earthquake drills are to be conducted on a regular basis and documented.

References-OSHA 29 CFR 1910.38(b)
OSHA 29 CFR 1910.39(c)(1) and (2)
OSHA 29 CFR 1910.165(b)(4)
OSHA 29 CFR 1910.1030(b)

Fall Protection Program

The Infection Control Program details the standards to identify those jobs and takes where occupational exposure to blood or other potentially infectious materials occur and describes how the employee will protect the identified employees. The programs to be written.

Fire Extinguisher Program

The purpose of the Fire Extinguishers Program is to comply with the State Fire Code and OSHA Standards for the placement, inspection, maintenance, and employee training for fire extinguishers.

References: OSHA 29 CFR 1910.157
National Fire Prevention Association 10: Standard For Portable Fire Extinguishers 2007 Edition.

Fire Protection Program

The Fire Protection Program provides a fire safe working environment by identifying eliminating potential fire hazards through consistent and comprehensive fire and safety inspections emphasizing with all applicable State Fire Code and Ky OSH standards.

References-OSHA 29 CFR Subpart E
OSHA 29 CFR Subpart L
Kentucky Fire Code at NFPA 1

First Aid Program

Employers with eight or more employees within the establishment shall have persons adequately trained to render first aid and adequate first aid supplies shall be readily available. Other employers shall have adequate first aid supplies readily available and person/persons adequately trained in first aid in the absence of outside treatment facilities.

Emergency eyewash station standards establish minimum performance and use requirements for eyewash and shower equipment. OSHA Standards require emergency eyewash stations where the eyes or body of any person who may be exposed to corrosive materials. Ky OSH Standards require emergency eyewash stations where the eyes or body of any person may be exposed to non-corrosive hazardous and particulate hazards.

References-803 KAR 2:310 Section 1(1)
29 CFR 1910.151(a) and (b)
803 KAR 2:310 Section (1)(2)
OSHA 29 CFR 1910.37(a)(4)

Hazard Communication Program

The HCP establishes standards to ensure that the hazards of all chemicals produced or imported are evaluated and the information concerning the hazards is transmitted to employees and employers. It is to be accomplished by a written Hazard Communication Program.

Reference-OSHA 29 CFR 1910.1200

Hearing Conservation Program

The Hearing Conservation Program determines exposure to excessive noise in the workplace, and if present, in the workplace, implements feasible engineering, administrative, and/or protective devices for employees, students, customers, visitors, and/or vendors.

Reference-OSHA 29 CFR 1910.95

Housekeeping Program

Housekeeping is more than just cleaning; it involves 1) actions to prevent dirt from entering the environment as well as it removal once it is there; 2) choices of products and methods that minimize the introduction of pollutants into the environment that the Housekeeping Program is designed to clean; 3) tasks designed for health and safety as well as tasks designed for appearance; and 4) training and monitoring performance.

References-OSHA 29 CFR 1910.141
OSHA 29 CFR 1910.176
OSHA 29 CFR 1910.22

Indoor Air Quality Program

The Indoor Air Quality Program provides standards and guidelines on the factors that contribute to indoor air quality and comfort problems and the responsibilities of management and employees in maintaining a good indoor environment.

References-OSHA 29 CFR 1910.94
U.S. Environmental Protection Agency

Infection Control Program (Bloodborne Pathogens Control)

The Infection Control Program details the standards to identify those jobs and takes where occupational exposure to blood or other potentially infectious materials occur and describes how the employee will protect the identified employees. The program to be written.

Reference-OSHA 29 CFR 1910.1030

Notices and Signs Program

Safety signs shall be posted in program areas, including laboratories and shops, to emphasize the importance of good safety procedures: 1) Asbestos, 2) Auto Lift Safety, 3) Comp0resed Air, 4) Damager-Hands and Fingers, 5) Other as required.

Employee information and notification signs and posters are required to be posted in public/employee accessible locations in all cabinet facilities: 1) Child Labor Law, 2) Employee Polygraph Protection Act, 3) Equal Employment Opportunity, 4) Fair Employment, 5) Family and Medical Leave Act, 6) Minimum Wage, 7) OSHA Job Safety and Health Protection, 8) Public Accommodation, 9) Unemployment Insurance, 10) Uniformed Services Employment and Reemployment Rights Act, and 11) Any additional postings required by state or federal regulations.

References-Various federal and state statutes and regulations.

Training Program

Each office/facility manager shall implement a safety training program that includes a general safety orientation for all staff upon initial employment and detailed training as required by federal and state safety standards. All training provided to employees must be documented. Suggested training courses with standards are:

- Back Safety, Kentucky Office of Safety and Health, Your Back and Your Job;
- Bloodborne Pathogens, 29 CFR 1910.1030(g)(2)(i), (ii)(A) through (C), (iii) through (vii)(A) through (N), (viii) and (ix)(A) through (C);
- Emergency Drills, 29 CFR 1910.38(c)(2);
- Emergency Action Plan, 29 CFR 1910.38(a)(5)(i), (ii)(a) through (c), and (iii);
- Fire Prevention, 29 CFR 1910.38(b)(4)(i) and (ii);
- Fire Extinguishers, 29 CFR 1910.157(g)(1)-(4)
- Workplace violence, OSHA guidelines, Crime Prevention Through Environmental Design and FBI Workplace Violence Issues in Response.

The Cabinet Safety Coordinator can provide Power Point Presentations and handouts on many of these courses.

Workplace Violence Prevention Program

This program is the approach an office or facility will take in developing plans to prevent and respond to workplace violence. The program does not have to written, but must be communicated to all employees and staff. The procedures are based on the hazards and risks of the particular work location.

References-OSHA guidelines, Crime Prevention Through Environmental Design, and FBI Workplace Violence Issues in Response


REPORT